

August 23, 2024

Hon. Marian W. Payson United States Magistrate Judge 100 State Street Rochester, New York 14614 Telephone: (585) 613-4080

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In Re: USA vs. Felicia Collins

6:24-mj-04013-MWP-6

## Dear Judge Payson:

On behalf of my client, Ms. Collins, we are respectfully requesting a forty-five (45) day adjournment of her status conference scheduled for Wednesday, August 28<sup>th</sup>, 2024. AUSA Marangola and I have been negotiating a potential plea agreement and have been working on the terms. He is preparing a proposed agreement and will be forwarding it to me within the next few business days in order to go over it with Ms. Collins. I have spoken with AUSA Marangola and he has no objection to my request. We are further requesting that the defendant reserve her right to a detention hearing in hopes of a more favorable disposition with the government. I would ask that time be excluded in the interests of justice for the aforementioned reasons. Thank you for your attention to this matter. If there is anything you need from either myself or my client, please do not hesitate to contact me.

Yours Truly,

Paul Guerrieri, Esq. 2526 Browncroft Blvd. Rochester, NY 14625

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